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Sam Elters
State Engineer

January 9, 2006

Mr. Brian Amme
PEIS Project Manager
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Dear Mr. Amme,

- 1 This letter is in reference to the November 2005, *Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States, Draft Programmatic Environmental Impact Statement*. The Arizona Department of Transportation (ADOT) is responsible for the integrity of the state's highway infrastructure while complying with state and federal environmental laws and regulations. To help accomplish this task, ADOT's Natural Resources Management Section (NRMS) routinely maintains vegetation within the transportation rights-of-way for safety and aesthetic purposes. In doing so, NRMS uses a variety of vegetation management techniques--mechanical, chemical, manual and cultural--in an intergraded approach to control hazardous vegetation and invasive plant species along Arizona highways. Herbicide use is an important component of ADOT's vegetation management program.
- 2 ADOT's NRMS supports the continued responsible use of established herbicides to help manage undesirable vegetation. Additionally, NRMS supports the "Protocol for Identifying, Evaluating and Using New Herbicides" to facilitate evaluation and addition of new chemicals as they become available in the future.
- 3 NRMS supports Alternative B - the "Preferred Alternative" because it will provide land managers the greatest degree of flexibility among the identified alternatives without compromising the principles of environmental stewardship. It is important that land managers have access to all available tools in their efforts to manage undesirable vegetation.
- 4 We look forward to our continued partnership with the BLM's Arizona State Office. We will continue to work with BLM staff to improve effectiveness and efficiency of vegetation management projects on roads crossing BLM lands.



Sincerely,

Paul J. Jaramila
for

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